

Exhibit “B”

Kenneth McLellan

From: Alex Kaufman <akaufman@chalmersadams.com>
Sent: Tuesday, February 21, 2023 12:40 PM
To: Kenneth McLellan
Cc: Keith Roussel; eunderriner@hallboothsmith.com
Subject: Re: Garmashov v .USPA

For Settlement Negotiation Purposes Only

Kenneth:

Mr. Garmashov is willing to dismiss the motion for contempt after receipt in good funds care of my new firm's trust account (wire instructions will be sent upon USPA's agreement of the following terms):

████████ settlement payment in 3 days

████████ in 3 days - comprised of the interest on the settlement payment since the court's order and attorney's fees since the motion to enforce was granted till present.

Reinstatement of Mr. Garmashov's ██████████

Mr. Garmashov is not interested in the new proposed terms of a ██████████

████████ These terms would be removed from your draft.

Within 3 business days of USPA's compliance with the above terms, we would file the mutual dismissal with prejudice.

Alex B. Kaufman, Esq.

Member

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On Feb 20, 2023, at 6:43 PM, Kenneth McLellan <mclellan.k@wssllp.com> wrote:

Mr. Kaufman-

Annexed please find an updated and revised proposed settlement agreement and stipulation of dismissal with prejudice. Please review the attached, and let us know your thoughts.

Thank you.

-Ken

Very truly yours,

Kenneth A. McLellan
Partner
(Admitted in NY and NJ)
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<2023.02.20, Letter to A. Kaufman.pdf>

<2023.02.21 Garmashov Settlement Agreement, Proposed.pdf>

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